

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

MOTION FOR EXTENSION TO RESPOND TO DISCOVERY REQUESTS

Defendants, State Industries, Inc. d/b/a APCOM and A.O. Smith Corporation (collectively "Defendants"), move this Court for an extension of time within which to respond to Plaintiff's First Set of Interrogatories, Requests for Production of Documents and requests for Admissions. As grounds, undersigned counsel states that he has been preparing for a trial that, until this past Friday, was scheduled to begin on July 26, 2011, before Judge Sharp. Charles Grant is preparing for a trial that is scheduled to begin on July 14, 2011, in Davidson County Circuit Court. Additionally, undersigned counsel was out of the country during the first week of July. Defendants' counsel has attempted to contact Plaintiff's counsel to obtain an agreed extension. However Plaintiff's counsel has not yet had a chance to respond to Defendant's request. Therefore, it is unknown whether or not the proposed extension is opposed.

WHEREFORE, Defendants move this Court for an extension of two weeks within which to respond to Plaintiff's discovery requests.